

State of California—Health and Human Services Agency California Department of Public Health



June 25, 2010

Pamela C. Creedon, Executive Officer California Regional Water Quality Control Board Central Valley Region 11020 Sun Center Drive #200 Rancho Cordova, California 95670-6114

Dear Ms. Creedon:

RESOLUTION NO. R5-2010-XXX: ESTABLISHMENT OF A CENTRAL VALLEY DRINKING WATER POLICY FOR THE SAGRAMENTO-SAN JOAQUIN DELTA-AND UPSTREAM TRIBUTARIES

The California Department of Public Health (CDPH) has received a draft version of the subject resolution, and offers the following comments:

- 1. CDPH supports the establishment of a drinking water policy for the Sacramento-San Joaquin Delta and its upstream tributaries.
- 2. Finding no. 4 (page 1) states that "surface water drinking water supplies in the Delta are currently of sufficient quality that municipal water users are required to provide the minimum level of treatment specified in the regulations." It is true that the concentrations of Cryptosporidium oocysts are low enough to not trigger additional treatment requirements. However, total organic carbon (TOC) and bromide concentrations are high enough to require alternative disinfection technologies (i.e. ozonation, ultraviolet irradiation, and/or chloramination.)
- 3. Resolution element no. 2 (page 6) states that "other efforts that are underway are the appropriate venues for working on salt and nutrients." These efforts may generate relevant data, but their purpose is to address "questions related to the Delta aquatic food web and nutrients." The possible effect of nutrients on TOC in Delta waters is a different matter, and will require additional evaluation and analysis.
- 4. Resolution element no. 6 (page 7) recommends that CDPH "should evaluate data collected for the drinking water constituents of concern and provide input on potential public health impacts at the levels detected." We are certainly

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willing to provide this input; however, since the Office of Environmental Health Hazard Assessment in California Environmental Protection Agency has responsibility of assessing the risks to public health, they should also provide input.

Please contact Carl Lischeske at (916) 449-5596 if you need further discussion on this matter.

Sincerely,

Gary H. Yamamoto, P.E., Chief

Division of Drinking Water

and Environmental Management